

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) JAMES EASON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 17-cv-00104-CVE-TLW
)	
(2) LIBERTY MUTUAL INSURANCE)	
COMPANY,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant Liberty Mutual Insurance Company ("Liberty Mutual") hereby removes the above-captioned action from the District Court of Tulsa County, State of Oklahoma, to the United States District Court for the Northern District of Oklahoma. In support of this removal, Liberty Mutual states as follows:

1. On January 25, 2017, Plaintiff James Eason ("Plaintiff") commenced an action in the District Court of Tulsa County, Oklahoma, entitled *James Eason v. Liberty Mutual Insurance Company*, Case No. CJ-2017-00305 (the "State Court Action"). A true copy of the state court docket sheet is attached as Exhibit 1. All process, pleadings, and orders filed or served in the State Court Action are attached hereto as Exhibits 2 through 4.

2. Plaintiff is a citizen of Oklahoma residing in Tulsa County, Oklahoma. Defendant Liberty Mutual is a company organized under the laws of the State of Massachusetts with its principal place of business in Boston, Massachusetts.

3. The Northern District of Oklahoma includes the state judicial district in which Plaintiff filed his Petition.

4. This is a civil action over which this Court has original jurisdiction based on diversity of citizenship and amount in controversy pursuant to 28 U.S.C § 1332, and which may be removed to this Court pursuant to 28 U.S.C. §§ 1441 and 1446.

5. Contemporaneous with Liberty Mutual's filing of this Notice, Liberty Mutual will serve written notice to Plaintiff's counsel of this filing, as required by 28 U.S.C. § 1446(d).

6. Defendant Liberty Mutual shall likewise file a true and correct copy of its Notice of Removal with the Clerk of the District Court in and for Tulsa County, State of Oklahoma, as required by 28 U.S.C. §1446(d).

Respectfully submitted,

s/Margo E. Shipley

William W. O'Connor, OBA No. 13200

Margo E. Shipley, OBA No. 32118

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**ATTORNEYS FOR DEFENDANT, LIBERTY
MUTUAL INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Timothy P. Clancy
Jody R. Nathan

ATTORNEYS FOR PLAINTIFF

s/Margo E. Shipley
Margo E. Shipley